

**UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK**

IN RE: REVOLUTION LIGHTING  
TECHNOLOGIES, INC. SECURITIES  
LITIGATION

No. 1:19-cv-00980-JPO

**NOTICE OF LEAD PLAINTIFF'S MOTION FOR  
DISTRIBUTION OF THE NET SETTLEMENT FUND**

PLEASE TAKE NOTICE that on a date and time as may be set by this Court, before the Honorable Paul Oetken, at the United States District Court for the Southern District of New York, Thurgood Marshall United States Courthouse, 40 Foley Square, New York, NY 10007, Lead Plaintiff Fred Remer (“Lead Plaintiff”), on behalf of himself and the settlement Class,<sup>1</sup> will and hereby does respectfully move this Court for an Order: (i) approving the administrative determinations of Epiq Class Action & Claims Solutions, Inc. (“Epiq”), the claims administrator, accepting and rejecting Proof of Claim and Release Forms (“Claims”) submitted in connection with the settlement reached in the above-captioned action as stated in the Declaration of Michael McGuiness in Support of Motion for Authorization To Distribute Net Settlement Fund (“McGuiness Distribution Declaration”), submitted herewith; (ii) ordering that any Claims received after July 14, 2021 or any responses to any deficiencies received after July 14, 2021 be rejected as untimely; (iii) authorizing distribution of the Net Settlement Fund to Authorized

---

<sup>1</sup> Unless otherwise noted, all capitalized terms have the meaning ascribed to them in the Stipulation of Settlement dated March 18, 2020 (“Stipulation”), ECF No. 58.

Claimants whose Claims have been accepted; (iv) authorizing payment from the Settlement Fund for Epiq's \$192,414.44 requested fees and expenses; (v) authorizing destruction of paper copies of Claims and related documentation one year after final distribution of the Net Settlement Fund, and electronic copies of the same one year after all funds have been distributed from the Net Settlement Fund; (vi) granting the release of claims related to the administration or taxation of the Settlement Fund; and (vii) for such other and further relief as this Court may deem just and proper.

This motion is based on the accompanying Memorandum of Law in support thereof and the McGuiness Distribution Declaration, with attached exhibits, filed herewith; the pleadings and records on file in this action; and other such matters and argument as the Court may consider.

The [Proposed] Distribution Order is filed concurrently herewith.

Dated: July 29, 2021

Respectfully submitted,

**FARUQI & FARUQI, LLP**

By: /s/ Katherine M. Lenahan  
Katherine M. Lenahan

Katherine M. Lenahan  
685 Third Avenue, 26th Floor  
New York, NY 10017  
Ph: (212) 983-9330  
Fx: (212) 983-9331  
E-mail: klenahan@faruqilaw.com

*Attorneys for Class Representative Fred Remer and  
Class Counsel for the settlement Class*